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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

KIN WAI WU,  
Plaintiff,

vs.

MT. HAWLEY INSURANCE, *et al*,  
Defendants.

) Case No.: C-11-01323 DMR

) **STIPULATION TO EXTEND EXPERT**  
) **DISCLOSURE AND RELATED**  
) **DISCOVERY DATES; ~~PROPOSED~~**  
) **ORDER**

) Next CMC: February 23, 2012  
) Time: 11:00 A.M.

) Trial Date: May 7, 2012  
) Time: 8:30 AM

) Magistrate Judge: Hon. Donna M. Ryu

**RECITALS**

1. The parties last appeared before the Court at the Case Management Conference on December 21, 2011. During the Case Management Conference Plaintiff requested that the date by which to designate and disclose expert witnesses be extended for a maximum of three weeks.

1 Plaintiff also requested that other expert related discovery dates be similarly continued to  
2 correspond to the extended expert disclosure date.

3 2. While the Court stated it was not inclined to grant Plaintiff's request without a  
4 formal motion, it was prepared to consider signing an Order extending the date by which experts  
5 were to be designated and disclosed along with other related discovery dates if stipulated to by  
6 the parties.


7  
8 3. Accordingly, subject to the Court's consent, the parties stipulate and agree as  
9 follows: **STIPULATION**

10 The parties stipulate, subject to the Court's discretion, that i.) the date by which the  
11 parties shall designate and disclose Experts and provide reports shall be extended to January 17,  
12 2012; ii.) rebuttal experts shall be disclosed and reports provided by January 31, 2012 iii.) all  
13 discovery from experts shall be completed by February 14, 2012 and iv.) all other deadlines  
14 remain as per the Court's June 30, 2011 Case Management and Pretrial Order for Jury Trial.

15 DATED: December 23, 2011

Respectively submitted,


16  
17 LAW OFFICES OF DAVID L. OLSON

18 By:   
19 David L. Olson  
20 Attorneys for Plaintiff KIN WAI WU

21 DATED: December 26, 2011

Respectively submitted,

22 MECKLER BULGER TILSON MARICK &  
23 PEARSON LLP

24 By:   
25 Fulton M. Smith  
26 Attorneys for Defendant MT HAWLEY  
27 INSURANCE COMPANY

~~PROPOSED~~ ORDER GRANTING EXTENSION OF EXPERT DISCOVERY

The Court has considered the parties' stipulation to continue i.) the date by which the parties shall designate and disclose experts and provide reports, to and including January 17, 2012; ii.) the date by which the rebuttal experts shall be disclosed and reports provided, to and including January 31, 2012 iii.) all discovery from experts to be completed by February 14, 2012 and iv.) all other deadlines remain as per the Court's June 30, 2011 Pretrial Order for Jury Trial..

Finding GOOD CAUSE, the Court hereby continues i.) the date by which the parties shall designate and disclose experts and provide reports, to and including January 17, 2012; ii.) the date by which the rebuttal experts shall be disclosed and reports provided, to and including January 31, 2012 and iii.) all discovery from experts to be completed by February 14, 2012.

IT IS SO ORDERED.

DATED: December<sup>27</sup>, 2011

